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**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: DA VINCI SURGICAL  
ROBOT ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

Lead Case No.: 3:21-CV-03825-AMO-LB

**DEFENDANT'S NOTICE OF RE-FILING  
MATERIALS SUBJECT TO THE COURT'S  
OMNIBUS SEALING ORDER**

Judge: The Honorable Araceli Martínez-Olguín

In response to the Court's March 28, 2025 Omnibus Sealing Order (ECF No. 332) endorsing the Parties' stipulation to re-file materials they filed provisionally under seal, Intuitive Surgical is hereby filing public versions of the documents listed below, which Intuitive provisionally filed under seal. Intuitive has removed or modified redactions to these documents as necessary to conform to the Court's June 17, 2025 Amended Omnibus Sealing Order (ECF No. 342).

Att. No.	Document Description	Exhibit No.	Original Docket No.	Originally Filed Under Seal/Redacted	Currently Redacted/Public
1	Opposition of Intuitive Surgical, Inc. to Motion for Class Certification – ECF No. 288		288	Sealed	Redacted
2	Declaration of Ashley Bass		288.4	Public	Public
3	Bass Dec. Ex. 1 - Expert Rebuttal Report of James W. Hughes	Exhibit 1	288.5	Sealed	Redacted
4	Bass Dec. Ex. 5 – Dep. of Judith Schimmel	Exhibit 5	288.9	Sealed	Public
5	Bass Dec. Ex. 6 – Dep. of David Rosa	Exhibit 6	288.10	Sealed	Public
6	Bass Dec. Ex. 7 - Intuitive-00091682 – Intuitive-00091687	Exhibit 7	288.11	Sealed	Redacted
7	Bass Dec. Ex. 9 – Dep. of John Wagner	Exhibit 9	288.13	Redacted	Public
8	Bass Dec. Ex. 10 – LARKIN-00009350	Exhibit 10	288.14	Sealed	Public
9	Bass Dec. Ex.	Exhibit 11	288.15	Sealed	Public

Att. No.	Document Description	Exhibit No.	Original Docket No.	Originally Filed Under Seal/Redacted	Currently Redacted/Public
	11 – LARKIN-00009370				
10	Bass Dec. Ex. 14 – Dep. of Marshall Mohr	Exhibit 14	288.18	Sealed	Public
11	Bass Dec. Ex. 15 - Intuitive-00107443 – Intuitive-00107451	Exhibit 15	288.19	Redacted	Redacted
12	Bass Dec. Ex. 17 – Dep. of Einer Elhauge	Exhibit 17	288.21	Sealed	Public
13	Bass Dec. Ex. 21 – Dep. of Karen F. Waninger	Exhibit 21	288.25	Redacted	Public
14	Bass Dec. Ex. 22 – Dep. of Mark Early	Exhibit 22	288.26	Redacted	Public
15	Defendant Intuitive Surgical, Inc.’s Objection Pursuant to Local Rule 7-3(d) to Certain Class Certification Reply Evidence		298	Sealed	Public
16	Defendant Intuitive Surgical, Inc.’s Opposition to Hospital Plaintiffs’ Administrative Motion For Leave to File Response To Defendant Intuitive Surgical, Inc.’s Objection to Certain Class Certification Reply Evidence		302	Sealed	Public

Dated: June 24, 2025

By: /s/ Andrew Lazerow

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**CERTIFICATE OF SERVICE**

On June 24, 2025, I caused a copy of the Defendant's Notice of Re-Filing Materials Subject to the Court's Omnibus Sealing Order to be electronically filed via the Court's Electronic Case Filing System, which constitutes service in this action pursuant to the Court's order of September 29, 2008.

Dated: June 24, 2025

By: /s/Andrew Lazerow  
ANDREW LAZEROW

**FILER'S ATTESTATION**

I, Andrew Lazerow, am the ECF User whose ID and password are being used to file this document. I hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: June 24, 2025

By: /s/Andrew Lazerow  
ANDREW LAZEROW